

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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June 15, 2020

**Via Electronic Filing**

The Honorable Judge Gabriel W. Gorenstein  
U.S. District Court Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

**Re:** *De La Rosa v. Aspenly Co. LLC et al,*  
Case No.: 1:18-cv-03456

Dear Honorable Judge Gorenstein:

This law firm represents Defendant Pure Green NYC 8th Street Corp (the “**Defendant**”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules 1(A) and (E), this letter respectfully serves to request an extension of time to complete fact discovery from June 15, 2020, to, through and including, August 17, 2020, assuming the current COVID-19 pandemic has been resolved at that time.

This is the fifth request to extend the discovery deadline. Plaintiff’s counsel neither objected nor consented to this requested.

The basis of this request is that the COVID-19 pandemic has complicated Defendant’s ability to conduct further discovery, in light of the stay-at-home order currently in effect. Defendant’s experts are unable to mobilize their team to survey the subject premises until after the quarantine has been lifted.

As such, Defendant respectfully requests that: (i) the fact discovery deadline of June 15, 2020 be extended to, through and including, August 17, 2020, assuming the current COVID-19 pandemic has been resolved at that time.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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VIA ECF: All Counsel